

**FILED**

OCT 20 2015

CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA  
BY DEPUTY

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11 UNITED STATES DISTRICT COURT  
12 SOUTHERN DISTRICT OF CALIFORNIA

13  
14 CELLULAR COMMUNICATIONS  
EQUIPMENT LLC,

15 Plaintiff,

16 vs.

17 HTC CORPORATION, et al.,

18 Defendants.

CASE NO. **15CV2373 BEN MDD**

PENDING IN UNITED STATES  
DISTRICT COURT FOR THE  
EASTERN DISTRICT OF TEXAS

CASE NO. 6:13-CV-00507-KNM  
(CONSOLIDATED LEAD CASE)

**AT&T MOBILITY LLC'S NOTICE  
OF MOTION AND MOTION TO  
COMPEL ACACIA RESEARCH  
CORPORATION TO PRODUCE  
PATENT LICENSE AGREEMENTS  
AND RELATED DOCUMENTS**

Date:  
Time:  
Dept.:

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26 FILED UNDER SEAL

27 HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY

28 **COPY**

1 PLEASE TAKE NOTICE that as soon as the matter can be heard in this  
2 court, Defendant AT&T Mobility LLC (“AT&T”) will move the Court to compel  
3 production of documents by third party Acacia Research Corporation.

4 Pursuant to Fed. R. Civ. P. 45, AT&T hereby respectfully moves for an order  
5 compelling Acacia Research Corporation to produce the following documents in  
6 response to AT&T’s subpoena:

- 7 • All licenses to the Asserted Patents involving Nokia Corp., Siemens and/or  
8 NSN;
- 9 • Complete and unredacted copies of the redacted agreements relating to NSN,  
10 Nokia Corp., and Siemens;
- 11 • [REDACTED]
- 12 • All agreements between one or more of the Inventors and one or more of  
13 Acacia, CCE, Nokia Corp., Siemens, and/or NSN related to User Equipment  
14 or any of the Patents-in-Suit, any Related Patent, or any Related Application;
- 15 • All license or settlement agreements relating to the Asserted Patents or  
16 similar technology;
- 17 • All portfolio licenses that include the Asserted Patents, and those that do not  
18 include one or more Asserted Patents; and
- 19 • Documents memorializing negotiations of licenses.

20  
21 This motion is supported by this notice and motion, the memorandum of  
22 points and authorities, declaration of Jeffrey D. Comeau and exhibits submitted  
23 concurrently herewith.  
24  
25  
26  
27  
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1 DATED: October 20, 2015

Respectfully submitted,

2 PAUL HASTINGS LLP

3 By: /s/ Jeffrey D. Comeau

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